

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

In re: United States v. Pirouz Sedaghaty

I, Colleen Anderson, state that:

1. I am a Special Agent (S/A) with the Internal Revenue Service - Criminal Investigation (IRS-CI), assigned to the Medford, Oregon Post-of-Duty. Since early 2002, I have been assigned to assist in the financial investigation of Pirouz Sedaghaty, Soliman Al-Buthe, and the Al-Haramain Islamic Foundation.
2. This declaration addresses several issues regarding how the government handled discovery in the trial of Pirouz Sedaghaty. First, I will address some of the meetings, discussions, and methods used by the government to track the government's discovery obligations. Second, I will address the volume of material produced by the government leading up to the trial. Finally, I will address the additional material regarding Richard and Barbara Cabral that was recently provided to the defense post trial.

TRACKING OF DISCOVERY OBLIGATIONS

3. After the return of the defendant in August of 2007, I was asked to assist in gathering and providing to the defense for discovery large volumes of material derived from the investigation. The material was gathered by the members of the prosecution team from several sources to include IRS case files, FBI case files, ICE case files, subpoenaed documents, and search warrant records. Numerous meetings and conference calls occurred between the members of the prosecution team to discuss the items that the government would be producing for discovery.

4. During trial preparation, I was asked to facilitate conference calls with the members of the prosecution team so that we could discuss the government's discovery obligations. During these calls, the government discussed many issues including providing all known testifying witness statements and providing any known potentially exculpatory material.

5. During one of these meetings, I specifically recall that AUSA Christopher Cardani asked me to closely review and identify any potentially exculpatory material in the Al-Haramain hard drives that related to the defendant's charitable works, community involvement, or stated opposition to violence. I printed documents that met the aforementioned criteria and provided them to the defense in Discovery batch #6, bates #1988-2019 on 2/26/09, a year and a half before trial. In order to ensure the defense had access to any other potentially exculpatory material from these drives, I also arranged on several occasions for the IRS computer expert to provide the defense with technical assistance to retrieve any potentially exculpatory information from these drives.

6. In January of 2009 and then again in March of 2009, members of the trial team which includes AUSA Charles Gorder, AUSA Chris Cardani, FBI S/A David Carroll, and I conducted discovery reviews of IRS and FBI case files in Medford. During these reviews, witness files were reviewed for discoverable material to include potentially exculpatory information and impeachment material for testifying witnesses. Although I have no specific memory of our discussions regarding Richard and Barbara Cabral, I believe that we did review the Cabral's interviews for potentially exculpatory information. I do not recall however, reviewing FBI source files pertaining to payments made to Richard Cabral during these meetings.

7. A review of the discovery batches provided to the defense shows shortly after the first discovery review in January of 2009 the government provided the defense with discovery batch #6 on 2/26/09. In this batch, a memorandum of interview dated 12/3/04 and 12/6/04 and the FBI 302 dated 8/17/07 with Richard and Barbara Cabral were provided. A review of these documents shows that they contain potentially exculpatory information. I believe since those were the only two interviews of Richard and Barbara Cabral provided at that time, their production shows the government was providing the defense with documents it found to be potentially exculpatory information during the first review.

8. I also note that a year later in March of 2010, Barbara Cabral is added to the governments amended witness list. Shortly after she was added, the government provides the defense in May of 2010 with six additional reports of interviews with Barbara Cabral and the resubmission of the memorandum of interview with Barbara Cabral dated 12/3/04 and 12/6/04. Due to the timing of the production of these additional interviews, it appears these interviews were produced in batch #14 by the government in order to provide the defense with all known impeachment material for the newly added witness.

9. While gathering the pertinent records, the defense made numerous discovery requests through official court filings and through informal contacts with the prosecution team. In an effort to track the official discovery requests, I summarized the specific discovery rulings of the court as listed in CR 191 in a document for the prosecution team. This summary for the prosecution team was color coded blue to identify items in which the government had complied with its discovery obligations, color coded red to identify items the government still needed to produce in discovery, and color coded purple to identify items in which the government still needed to seek clarification on from the court.

10. A review of this summary shows that notes from FBI contacts with the defendant and notes from several testifying witnesses were identified by the prosecution team as needing to be produced pursuant to the court's discovery rulings. The summary shows that these notes were gathered and produced to the defense in discovery batches #9 and #11. Richard and Barbara Cabral were not identified in this summary as testifying witnesses and therefore the notes from their contacts and interviews do not appear to have been produced pre-trial.

11. During the post trial review of Richard and Barbara Cabral's FBI files, I was made aware of the fact that the government had not provided to the defense the notes from Barbara Cabral's interviews. Although the defense had made pre-trial requests for additional notes and clarification on notes from interviews with the defendant and accountant Thomas Wilcox, the defense had not asked for the missing notes for Barbara Cabral. If the defense had asked for these notes pre-trial, I would have provided these notes.

VOLUME OF DISCOVERY

12. The discovery material that was produced to the defense consisted of over 3,800 single pages of discovery and an additional 24 boxes of records, estimated at over 40,000 pages. The production of this material was facilitated through the use of 17 separate discovery spreadsheets and eventually the scanning of all 24 boxes of records. The 3,800 single pages of discovery were bates stamped and logged into the discovery spreadsheets (exhibit A). The 24 boxes of records that were scanned were produced to the defense electronically, per their request (exhibit B).

13. In addition to the large volume of records provided to the defense, the government also provided the defense with a significant amount of technical assistance. On several occasions documented below, the government's computer expert assisted the defense in retrieving the electronic data from the seized Al-Haramain hard drives. The documents obtained by the defense through the assistance of the government's computer expert accounted for a significant part of the defense's trial exhibits (exhibit C).

14. The following is a summary of the documents and the assistance the government provided the defense prior to trial:

- On 12/19/07 Discovery batch #1 was provided containing approximately 1,215 pages of statements, memos, search warrant documents, financial records, currency and immigration forms, extracted computer documents, website documents, title records, and tax records. In addition, the defense was given unlimited access to 24 boxes of subpoenaed bank records, subpoenaed Al-Haramain corporate documents, and items from the search warrant including video tapes, computer disks, and prisoner letters.
- On 2/22/08 Discovery batch #2 was provided containing several financial interviews.
- On or about 3/10/08 Discovery batch #3 was provided containing the search warrant return and firearms inventory.

- From 3/21/2008 through 4/3/2008, numerous contacts occurred with defense investigators to discuss how the Al-Haramain hard drive computer evidence would be provided to the defense, including their software preferences.
- On 4/23/08 Discovery batch #4 was provided containing approximately 287 pages of correspondence from Al-Haramain civil attorneys, voluntary consent forms, real estate records, and escrow records.
- On or about 5/15/08 images of the Al-Haramain hard drives were provided. In addition, upon the request of the defense, the contents of numerous floppy disks and CD's seized during the execution of the warrant were copied on to a hard drive and sent to the defense to facilitate their review of the material.
- On 8/13/08 the 24 boxes of subpoenaed bank records, subpoenaed Al-Haramain corporate documents, and items from the search warrant were brought to Pacific Legal for scanning, upon the request of the defense. In addition, the numerous boxes of video tapes seized during the warrant were brought to the Portland USAO for review by the defense, upon their request.
- On or about 9/5/08, the defense was provided a new copy of a computer hard drive in a program they requested because they were unable to retrieve data from a drive.
- On 10/3/08 Discovery batch #5 was provided containing approximately 174 pages of financial records, memorandum of contacts, audio taped conversations, and a redacted report of the contents of Summer Rife's computer.
- On 12/9/08, upon the request of the defense, the government provided a summary of which hard drives came from each of the seized computers.
- On 2/26/09 Discovery batch #6 was provided containing 438 pages of bank documents, interviews, and documents pulled from the seized computer hard drives. Specifically, the government provided a memo of interview dated 12/3/04 and 12/6/04 with Richard and Barbara Cabral and the completed FBI 302 with Richard Cabral dated 8/17/07.

In addition, upon the request of the defense, on this same date the government facilitated a phone conference between the government's and the defense's computer experts. The government's expert was asked to explain in detail how he located deleted primary e-mail files from the seized Al-Haramain hard drives. He then counseled the defense's expert on how to recover this vital information.

- On 4/8/09 the government again facilitated a phone conference between the government's and the defense's computer experts. The government's expert explained to the defense how to properly use their software to facilitate the recovery of deleted data and then how to validate the files retrieved from the computer hard drives.
- On 4/14/09 Discovery batch #7 was provided containing approximately 310 pages of interviews, letters to the FBI, and translations of documents and CDs provided by the government of Russia.
- On 4/17/09, upon the defense's request, the government prepared and faxed a listing of the actual sector addresses to the e-mail files (PST & DBX) recovered by the government from the seized computers. This was done in order to assist the defense in locating the deleted pertinent files on the seized computers that the defense had been unable to locate or extract.
- On 5/22/09 the government facilitated a defense interview with Al-Haramain accountant, Thomas Wilcox, at the IRS Medford office.
- On 7/13/09 Discovery batch #8 was provided containing approximately 125 pages of interviews, accountant files, translations of Russian documents, a response from the Islamic Society of North America (ISNA), and a CD of a phone call with Sedaghaty.
- On 8/14/09 Discovery batch #9 was provided containing approximately 279 pages of fatwa's associated with Al-Haramain, correspondence with ISNA, interviews, notes from FBI contacts with defendant, Russian FSB documents, and computers forensic reports. These computer forensic reports detailed specifically where the government recovered their electronic search warrant exhibits that were to be introduced at trial.

- On 9/9/09 Discovery batch #10 was provided containing approximately 151 pages of interviews, letters, e-mails, and a copy of Summer Rife's laptop hard drive.
- On 1/19/10 Discovery batch #11 was provided containing approximately 200 pages of criminal history inquiries, expert reports, interviews, notes, and a Kavkaz Institute DVD.
- On 3/31/10 Discovery batch #12 was provided containing my Grand Jury testimony on February 17, 2005.
- On 4/29/10 Discovery batch #13 was provided containing approximately 178 pages of IRS tax exempt correspondence, the government's Grand Jury presentation, and interviews with an IRS tax exempt specialist.
- On 5/10/10 Discovery batch #14 was provided containing approximately 167 pages of interviews, notes, bank records, photos, and translations. Specifically, in this batch the government again provided the memorandum of interview dated 12/3/04 and 12/6/04 with Richard and Barbara Cabral, an FBI 302 dated 9/28/04 for Barbara Cabral, and five FBI FD-1023s for Barbara Cabral dated 4/23/08, 2/26/10, 3/2/10, 3/8/10, and 4/26/10.
- On 7/7/10 Discovery batch #15 was provided containing approximately 58 pages Al-Rajhi bank records and translations, recovered e-mail, an interview of a civil attorney, and a curriculum vitae for the government's computer expert.
- On 7/26/10 Discovery batch #16 was provided containing approximately 32 pages of Al-Rajhi Bank records and translations, a government exhibit, an interview, and a contact with a defense attorney.
- On 9/1/10 Discovery batch #17 was provided containing additional Grand Jury testimony regarding my return of Grand Jury material.

POST TRIAL MATERIAL

15. In December of 2010, prior to S/A Dave Carroll going on leave, I recall participating in phone calls with other members of the prosecution team regarding Barbara Cabral. During these phone calls, I learned that S/A Carroll had sought concurrence from the USAO on making a payment to Mrs. Cabral post trial.

16. When S/A Carroll returned from leave, I again participated in phone calls with the prosecution team regarding Barbara Cabral. During one call, the payments made to Richard Cabral as a source were discussed and the fact that Barbara Cabral was present during one payment. Although the payments occurred five years prior, I did recall being present for at least one of the payments to Richard Cabral in which I believe Barbara Cabral may have been present. I did not know the total of these payments however.

17. I also do not know whether Richard Cabral was specifically paid for information pertaining to the Sedaghaty case or for information Mr. Cabral provided to the FBI on several other cases. I recall that my contacts with Richard Cabral occurred after the defendant fled the country in February of 2003. Therefore, on many occasions when I did accompany S/A Carroll to meet with Richard Cabral, Mr. Cabral seemed to be providing more information on the current cases the FBI was working on than the Sedaghaty case.

18. In addition, during one call I learned for the first time that S/A Carroll may have made a pre-trial comment to Barbara Cabral about trying to get her a post trial payment. After S/A Carroll told the rest of the trial team about this comment, there was a long awkward silence. After, AUSA Cardani and AUSA Gorder told S/A Carroll that the comment to Barbara Cabral needed to be documented along with the specific payments to Richard Cabral.

19. On or about January 6, 2011, the defense was provided additional post trial discovery material regarding Richard and Barbara Cabral in Discovery batch #18 (exhibit D). This material consisted of interviews and notes of contacts with Richard and Barbara Cabral over a seven year period.

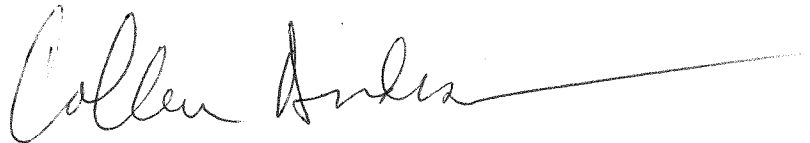
20. Once an omission of discovery material was discovered, the prosecution team under the supervision of AUSA Kelly Zusman conducted an extensive review of all source files maintained by the FBI for Richard and Barbara Cabral. As the IRS has never paid any witnesses in relation to this case, no additional IRS material pertaining to Richard and Barbara Cabral was found to be pertinent to this review. The materials provided in discovery batch #18 were derived from this review.

21. After the defense was provided Discovery batch #18, in CR 520 the defense claimed that "altered copies of 302 reports" were provided to them by the government. In addition, in CR 524 the defense claims that "the two FBI 302 reports dated 8/17/07 are dramatically different in significant places." However, the only exculpatory information the defense claims existed in either version of the FBI 302 reports pertained to a statement by Richard Cabral in which he "did not recall Sedaghaty discussing the topic of Kosovo or supporting mujahideen there".

22. A review of the two different versions of the same report clearly shows that the most recent version sent to the defense in Discovery batch #18 is nothing more than a draft version of the final report previously given to the defense in Discovery batch #6, bates #1772-1773. In fact, the final report containing this alleged exculpatory information was given to the defense in batch #6 on 2/26/09, a year and a half before trial.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 14, 2011

A handwritten signature in black ink, appearing to read "Colleen Anderson", followed by a long horizontal line extending to the right.

Colleen Anderson

Special Agent, IRS-CI

DISCOVERY SPREADSHEET-1

| <u>INVENTORY ITEM</u> | <u>NUMBER OF PAGES IN DOCUMENT</u> | <u>BATES NUMBERS</u> | <u>BATCH NUMBER</u> |
|--|--|----------------------|-------------------------|
| <u>STATEMENTS-MEMOS</u> | | | |
| Statement by Thomas Wilcox, CPA dated 11/18/03 | 7 | 4-10 | 1 |
| Interview of Thomas Wilcox, CPA dated 6/12/03 | 2 | 11-12 | 1 |
| Interview of Thomas Wilcox, CPA dated 6/17/03 | 6 | 13-18 | 1 |
| Interview of Thomas Wilcox, CPA dated 11/18/03 | 3 | 19-21 | 1 |
| Interview of Thomas Wilcox, CPA dated 2/02/04 | 1 | 22 | 1 |
| Interview of Rashed Fakhruddin, President of ICN 2/9/05 & 2/14/05 | 3 | 1-3 | 1 |
| Memorandum of Activity dated 8/15/07 pertaining to Sedaghaty arrest | 2 | 23-24 | 1 |
| Letter from Faisal Kutty dated September 29, 2006 (ISNA Canada) | 16 | 25-40 | 1 |
| Interview of Raya Shokatford dated 8/19/05 | 8 | 75-82 | 1 |
| Interview of Mohammed El-Feki dated 1/31/05 | 5 | 41-45 | 1 |
| Interview of Daveed Gartenstein-Ross dated 10/15/04 and 10/18/04 | 5 | 46-50 | 1 |
| Interview of Daveed Gartenstein-Ross dated 11/8/04 | 1 | 53 | 1 |
| Interview of Daveed Gartenstein-Ross dated 10/27/04 | 1 | 52 | 1 |
| Interview of Daveed Gartenstein-Ross dated 10/25/04 | 1 | 51 | 1 |
| Interview of Daveed Gartenstein-Ross dated 5/20/04 | 1 | 54 | 1 |
| Interview of Daveed Gartenstein-Ross dated 1/15/03 | 4 | 55-58 | 1 |
| Interview of Daveed Gartenstein-Ross dated 3/16/04 | 13 | 59-71 | 1 |
| Interview of Daveed Gartenstein-Ross dated 10/18/05 | 2 | 72-73 | 1 |
| Interview of Daveed Gartenstein-Ross | 1 | 74 | 1 |

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| INVENTORY ITEM | NUMBER OF PAGES IN DOCUMENT | BATES NUMBERS | BATCH NUMBER |
|---|--------------------------------|---------------|-----------------|
| <u>SUBJECT STATEMENTS</u> | | | |
| Interview of Pirouz Sedaghaty dated 9/15/01 | 4 | 83-86 | 1 |
| Interview of Pirouz Sedaghaty dated 9/18/01 | 5 | 87-91 | 1 |
| Interview of Pirouz Sedaghaty dated 10/3/01 | 2 | 92-93 | 1 |
| Interview of Pirouz Sedaghaty dated 10/3/01 and 10/9/01 | 19 | 94-112 | 1 |
| Interview of Pirouz Sedaghaty dated 10/5/01 | 1 | 113 | 1 |
| Interview of Pirouz Sedaghaty dated 12/27/01 | 2 | 114-115 | 1 |
| Interview of Pirouz Sedaghaty dated 2/15/02 | 1 | 116 | 1 |
| Interview of Pirouz Sedaghaty dated 4/15/02 | 1 | 117 | 1 |
| Interview of Pirouz Sedaghaty dated 6/24/02 | 2 | 118-119 | 1 |
| Interview of Pirouz Sedaghaty dated 7/1/02 | 5 | 120-124 | 1 |
| Interview of Pirouz Sedaghaty dated 11/13/02 | 2 | 125-126 | 1 |
| Interview of Pirouz Sedaghaty dated 1/21/03 | 6 | 127-132 | 1 |
| Interview of Pirouz Sedaghaty dated 1/31/03 | 4 | 133-136 | 1 |
| <u>SEARCH WARRANT DOCUMENTS</u> | | | |
| Application and affidavit for search warrant | 35 | 137-171 | 1 |
| Search warrant and inventory sheets | 14 | 172-185 | 1 |
| Firearms inventory | 1 | 186 | 1 |

| INVENTORY ITEM | NUMBER OF PAGES IN DOCUMENT | BATES NUMBERS | BATCH NUMBER |
|--|--------------------------------|---------------|-----------------|
| <u>American Express</u> | | | |
| American Express Traveler's checks (front and back) GB019-375-240 through GB019-375-369 and trust receipt | 53 | 187-239 | 1 |
| <u>ICE</u> | | | |
| ICE- CMIRS, I-94's, Custom Declaration, Custom Form 4790, research request | 37 | 240-276 | 1 |
| <u>Computer Related</u> | | | |
| Bombings(#9 ilook7351-65775653).doc | 1 | 277 | 1 |
| Meaning of Jihad (#9 ilook97955429).doc | 2 | 278-279 | 1 |
| Pete Question to BinLaden (#9 ilook7255-65749157).doc | 1 | 280 | 1 |
| Seda 8 photos | NA | 281-289 | 1 |
| Enaam Arnout e-mail | 3 | 290-292 | 1 |
| Enaam Arnout letter | 1 | 293 | 1 |
| Trips made through Al Haramain USA office | 1 | 294 | 1 |
| Protest e-mail | 2 | 295-296 | 1 |
| Arnout hits from Seda 7,8,9 | 7 | 297-303 | 1 |
| e-group correspondence from Seda 7, initial date 7/26/2000 | 23 | 304-326 | 1 |
| e-group correspondence from Seda 7, initial date 7/26/2000 | 31 | 327-357 | 1 |
| Letter to Fred | 2 | 358-359 | 1 |
| Proposed yearly operational plan | 10 | 360-369 | 1 |
| Constitution of AHIF | 9 | 370-378 | 1 |

| INVENTORY ITEM | NUMBER OF PAGES IN DOCUMENT | BATES NUMBERS | BATCH NUMBER |
|---|--------------------------------|---------------|-----------------|
| <u>AHIF Website</u> | | | |
| Latest News about the jihaad in Chechnya | 1 | 379 | 1 |
| Latest News about the jihaad in Chechnya | 2 | 380-381 | 1 |
| Al Haramain online newsletter | 1 | 382 | 1 |
| Al Haramain Brotherhood article | 2 | 383-384 | 1 |
| <u>Title Records</u> | | | |
| Title records for purchase of Ashland prayer house | 30 | 385-414 | 1 |
| Title records for purchase of Springfield prayer house | 20 | 415-434 | 1 |
| <u>Specific Financial Records</u> | | | |
| Wire transfer from Arborist account to Albania for \$2000 | 1 | 435 | 1 |
| JP Morgan Chase batch ticket | 5 | 436-440 | 1 |
| AHIF check # 9456 for \$131,300 | 1 | 441 | 1 |
| AHIF check # 9624 for \$21,000 | 1 | 442 | 1 |
| Bank of America cashier's check #1001040568 for \$21,000 | 2 | 443-444 | 1 |
| <u>IRS-TAX</u> | | | |
| Al Haramain 2000 Form 990 | 19 | 445-463 | 1 |
| Thomas Wilcox work papers | several packages | 464-1215 | 1 |

| INVENTORY ITEM | NUMBER OF PAGES IN DOCUMENT | BATES NUMBERS | BATCH NUMBER |
|--|--------------------------------|---------------|-----------------|
| <u>Bank Records</u> | | | |
| Accounts pertaining to Sedaghaty, Al-Buthe, and Al-Harmain | N/A | | |
| <u>Al Haramain documents received pursuant to subpoena</u> | | | |
| Various corporate documents provided pursuant to subpoena | NA | | |
| <u>SEARCH WARRANT ITEMS SEIZED</u> | | | |
| Video tapes, computer related disks, prisoner letters, other materials | NA | | |

DISCOVERY SPREADSHEET-2

| <u>INVENTORY ITEM</u> | <u>NUMBER OF PAGES IN DOCUMENT</u> | <u>BATES NUMBERS</u> | <u>BATCH NUMBER</u> |
|--|--|----------------------|-------------------------|
| <u>STATEMENTS-MEMOS</u> | | | |
| Interview of Debra Ingram dated 12/4/03 | 2 | 1216-1217 | 2 |
| Interview of Debra Ingram dated 2/15/05 | 1 | 1218 | 2 |
| Interview of Helen Moore dated 11/13/03 | 1 | 1219 | 2 |
| Interview of Helen Moore dated 2/15/05 | 1 | 1220 | 2 |
| Interview of Jeremy Jones dated 2/24/05 | 1 | 1221 | 2 |

DISCOVERY SPREADSHEET-3

| <u>INVENTORY ITEM</u> | <u>NUMBER OF PAGES IN DOCUMENT</u> | <u>BATES NUMBERS</u> | <u>BATCH NUMBER</u> |
|--|--|----------------------|-------------------------|
| <u>STATEMENTS-MEMOS</u> | | | |
| Search Warrant return and attachments | 8 | 1222-1229 | 3 |
| Firearms inventory | 1 | 1230 | 3 |


DISCOVERY SPREADSHEET-4

| <u>INVENTORY ITEM</u> | <u>NUMBER OF PAGES IN DOCUMENT</u> | <u>BATES NUMBERS</u> | <u>BATCH NUMBER</u> |
|--|--|----------------------|-------------------------|
| <u>STATEMENTS-MEMOS</u> | | | |
| Letter from Bernabei dated 5/14/04 | 36 | 1231-1266 | 4 |
| Letter from Thomas Nelson dated 1/26/05 | 11 | 1267-1277 | 4 |
| Memorandum of Contact dated 2/18/04 | 3 | 1278-1280 | 4 |
| Voluntary Consent to a Search of Person, Premises, or Conveyance forms dated 2/18/04 | 2 | 1281-1282 | 4 |
| Letter from Bernabei dated 5/27/04 | 14 | 1283-1296 | 4 |
| Letter from Bernabei dated 8/04/04 | 6 | 1297-1302 | 4 |
| Letter from Kabat dated 8/31/04 | 8 | 1303-1310 | 4 |
| Letter from Bernabei dated 8/31/04 | 12 | 1311-1322 | 4 |
| Letter from Bernabei dated 9/7/04 | 14 | 1323-1336 | 4 |
| (Reserved) | | 1337-1341 | |
| FD-302 dated 8/30/02 with David Berger | 1 | 1342 | 4 |
| Fax from Heyle Realtors dated 10/23/03 | 4 | 1343-1346 | 4 |
| Fax from David Berger dated 2/18/04 | 5 | 1347-1351 | 4 |
| Fax from David Berger dated 2/20/04 | 3 | 1352-1354 | 4 |
| Escrow records for sale of 161 E Valley View | 95 | 1355-1449 | 4 |

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| <u>INVENTORY ITEM</u> | <u>NUMBER OF PAGES IN DOCUMENT</u> | <u>BATES NUMBERS</u> | <u>BATCH NUMBER</u> |
|---|--|----------------------|-------------------------|
| Escrow records for purchase of 161 E Valley View | 73 | 1450-1522 | 4 |

I ACKNOWLEDGE RECEIPT OF THE ABOVE DOCUMENTS THIS 23rd day of April, 2008.



W.J. Teardale

DISCOVERY SPREADSHEET-5

| <u>INVENTORY ITEM</u> | <u>NUMBER OF PAGES IN DOCUMENT</u> | <u>BATES NUMBERS</u> | <u>BATCH NUMBER</u> |
|--|--|----------------------|-------------------------|
| CD containing two audio taped conversations with Daveed Gartenstein-Ross and Soliman al-Buthe dated 11-21-05 & 3-8-06. | 0 | 1523 | 5 |
| Memorandum of contact with Laleh Zahedi and Summer Rife dated June 23, 2003 | 2 | 1524-1525 | 5 |
| Memorandum of contact-Naba Commercial Brokerage dated 9/13/07 | 2 | 1526-1527 | 5 |
| American Express records | 158 | 1528-1685 | 5 |
| Redacted report of contents from Summer Rife's computer | 11 | 1686-1696 | 5 |
| <u>SIGNATURE</u> | <u>DATE OF RECEIPT</u> | | |

DISCOVERY SPREADSHEET-6

| INVENTORY ITEM | NUMBER OF PAGES IN DOCUMENT | BATES NUMBERS | BATCH NUMBER |
|--|--------------------------------|---------------|-----------------|
| Bank of America wire dated 4-15-99 to Tirane Albania | 1 | 1697 | 6 |
| Bank of America-processing documents pertaining to \$21,000 cashier's check | 6 | 1698-1703 | 6 |
| Bank of America-Al Haramain corporate documents | 12 | 1704-1715 | 6 |
| Oregon Secretary of State & business registry records | 21 | 1716-1736 | 6 |
| Letter from Somali and East African Youth Center Inc. | 2 | 1737-1738 | 6 |
| <u>Memorandum of Interviews</u> | | | |
| MOI dated 11-2-04 with Anwar Khan with AHIF corp document #300171 | 3 | 1739-1741 | 6 |
| MOI dated 7-25-02 with Laura Lang | 2 | 1742-1743 | 6 |
| MOI dated 3-31-04 with Captain Hansen, Maryland Correctional Adjustment Center | 1 | 1744 | 6 |
| MOI dated 5-13-04 with Father Charles Canterna | 2 | 1745-1746 | 6 |
| MOI dated 10-25-04 with Erick Ali | 2 | 1747-1748 | 6 |
| MOI dated 12-3-04 & 12-6-04 with Richard and Barbara Cabral | 4 | 1749-1752 | 6 |
| MOI dated 10-23-03 with Kirk Heyle | 3 | 1753-1755 | 6 |
| MOI dated 7-18-02 with Sandy Royce | 2 | 1756-1757 | 6 |
| MOI dated 4-2-2004 with Chuck Whiteley | 2 | 1758-1759 | 6 |
| MOI dated 11-5-04 with Ferhad Erdogan | 4 | 1760-1763 | 6 |
| MOI dated 5-25-04 with Randall Painter | 2 | 1764-1765 | 6 |
| MOI dated 11-24-03 with Thomas Dougherty | 1 | 1766 | 6 |

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| INVENTORY ITEM | NUMBER OF PAGES IN DOCUMENT | BATES NUMBERS | BATCH NUMBER |
|---|--------------------------------|---------------|-----------------|
| MOI Dated 10-7-04 with Mary Foster | 2 | 1767-1768 | 6 |
| Vacant number | | 1769 | |
| MOI dated 1-7-04 with Ragina Kushima | 2 | 1770-1771 | 6 |
| <u>FBI 302's</u> | | | |
| 302 dated 8-17-07 of Richard Cabral | 2 | 1772-1773 | 6 |
| 302 dated 2-20-03 of Judith Mahoney | 2 | 1774-1775 | 6 |
| 302 dated 4-15-08 with Ferhad Erdogan | 6 | 1776-1781 | |
| 302 dated 4-30-08 with Ferhad Erdogan | 4 | 1782-1785 | 6 |
| 302 dated 1-30-05 with Darryl Phelps | 7 | 1786-1792 | 6 |
| IRS records on AHIF application for charitable status (1023) | 95 | 1793-1887 | 6 |
| Randall Painter prison documents | 98 | 1888-1985 | 6 |
| <u>AHIF Computers</u> | | | |
| Vacant number | | 1986 | |
| DVD-Sheeshaan e-group documents provided electronically | | 1987 | 6 |
| Various computer documents | 32 | 1988-2019 | 6 |
| Computer documents re: mujahideen/sheeshaan, Abdul-Qaadir, AHIF online newsletter, azzam, qoqaz, Bin Laden, Turkish martyrs, Russian web site e-mail & thank you from AQ, history of Chechnya, money e-mails, khattab support e-mail, Springfield mosque money e-mail, mujahideen word documents, letter to mujahideen/sheeshaan. | 116 | 2020-2135 | 6 |

| INVENTORY ITEM | NUMBER OF PAGES IN DOCUMENT | BATES NUMBERS | BATCH NUMBER |
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| SIGNATURE | DATE OF RECEIPT |
|-----------|-----------------|

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DISCOVERY SPREADSHEET-7

| <u>INVENTORY ITEM</u> | <u>NUMBER OF PAGES IN DOCUMENT</u> | <u>BATES NUMBERS</u> | <u>BATCH NUMBER</u> |
|---|--|----------------------|-------------------------|
| 302 dated 1/7/03 for Daveed Gartenstein-Ross | 5 | 2163-2167 | 7 |
| 302 dated 5/11/04 for Daveed Gartenstein-Ross | 2 | 2168-2169 | 7 |
| 302 dated 2/17/05 for Daveed Gartenstein-Ross | 3 | 2170-2172 | 7 |
| 302 dated 11/21/05 for Daveed Gartenstein-Ross | 1 | 2173 | 7 |
| 302 dated 3/10/06 for Daveed Gartenstein-Ross | 1 | 2174 | 7 |
| Testimony of Daveed Gartenstein-Ross 9/19/2006 | 9 | 2175-2183 | 7 |
| Letter to FBI dated 9/18/01 | 2 | 2184-2185 | 7 |
| Letter to FBI dated 7/2/02 with information re: Tel Aviv Embassy | 14 | 2186-2199 | 7 |
| 302 dated 10/7/04 for Ben Searcy | 5 | 2200-2204 | |
| Letter to FBI dated 10/2/01 | 1 | 2205 | 7 |
| Translations of documents and CDs provided by the government of Russia. CDs numbered 2284;2324;2326;2451;2472 | 178 | 2206-2472 | 7 |
| Letter from Charles Gorder to Steve Wax dated 3-25-09 | 1 | 2473 | 7 |

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DISCOVERY SPREADSHEET-8

| INVENTORY ITEM | NUMBER OF PAGES IN DOCUMENT | BATES NUMBERS | BATCH NUMBER |
|--|--------------------------------|---------------|-----------------|
| Helen Moore 302 dated 1-22-02 & 1-24-02 | 2 | 2474-2475 | 8 |
| Noel Henry 302 dated 9/23/02 | 2 | 2476-2477 | 8 |
| Evan Kholman 302 dated 6/2/04 | 12 | 2478-2489 | 8 |
| Daveed-Friends of Charities Association report | 5 | 2490-2494 | 8 |
| Tom Wilcox-word & excel files (previously provided) | 34 | 2495-2528 | 8 |
| Criminal History- Pirouz Sedaghaty | 3 | 2529-2531 | 8 |
| Background interview report with Sedaghaty re: Gartenstein-Ross | 2 | 2532-2533 | 8 |
| Visa information for Soliman Al buthe | 8 | 2534-2541 | 8 |
| Translation of Russian documents (task 1224) | 13 | 2542-2554 | 8 |
| Application for Daveed Gartenstein-Ross | 15 | 2555-2569 | 8 |
| EI Feki correspondence | 8 | 2570-2577 | 8 |
| ISNA response to questions | 16 | 2578-2593 | 8 |
| CD of phone call between Mark Poret and Sedaghaty | 1 | 2594 | 8 |
| DVD of contents of Wilcox computer and forensic report | 5 | 2595-2599 | 8 |

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DISCOVERY SPREADSHEET-9

| <u>INVENTORY ITEM</u> | <u>NUMBER OF PAGES IN DOCUMENT</u> | <u>BATES NUMBERS</u> | <u>BATCH NUMBER</u> |
|--|--|----------------------|-------------------------|
| al-Jibrin fatwah with translation, statement by al-'Uthaymin with translation, and document stating the main activities of AHIF in Chechnya with translation | 8 | 2600-2607 | 9 |
| Letter to Faisal Kutty dated March 10, 2006 | 1 | 2608 | 9 |
| Letter to Faisal Kutty dated July 17, 2006 | 1 | 2609 | 9 |
| Memorandum of Interview of R.D. Kanan dated July 22 & 23, 2009 and documents | 51 | 2610-2660 | 9 |
| 302 dated 6/11/09 with Paul Groover | 1 | 2661 | 9 |
| 302 dated 6/5/09 with Paul Groover and attachments | 55 | 2662-2716 | 9 |
| Interview notes from FBI interviews with Pete Seda | 36 | 2717-2752 | 9 |
| Memorandum for Colleen Anderson dated 7/31/09 from Richard Smith, CIS | 3 | 2753-2755 | 9 |
| Memorandum for Colleen Anderson dated 8/04/09 from Jeremy Christianson, Computer Forensics Manger with attachments | 79 | 2756-2834 | 9 |
| Blank CMIR, Customs Form 4790 | 2 | 2835-2836 | 9 |
| State of Oregon Corporation Commission documents | 11 | 2837-2847 | 9 |
| Bank of America signature card for the Arborist account | 1 | 2848 | 9 |
| Documents from the Russian FSB | 31 | 2849-2879 | 9 |

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DISCOVERY SPREADSHEET-10

| <u>INVENTORY ITEM</u> | <u>NUMBER OF PAGES IN DOCUMENT</u> | <u>BATES NUMBERS</u> | <u>BATCH NUMBER</u> |
|---|--|----------------------|-------------------------|
| Sketch of search warrant location | 6 | 2880-2885 | 10 |
| Letter to Dr. Ashraf dated April 4, 2005 | 3 | 2886-2888 | 10 |
| Letter from Dr. Ashraf dated May 5, 2005 | 1 | 2889 | 10 |
| Letter from Dr. Ashraf dated June 20, 2005 | 1 | 2890 | 10 |
| 302 dated 5/19/09 for Daveed Gartenstein-Ross | 2 | 2891-2892 | 10 |
| E-mails with Daveed Gartenstein-Ross, to include e-mails with Soliman Al-buthe. | 23 | 2893-2915 | 10 |
| Jean-Charles Brisard CD | 1 | 2916 | 10 |
| 302 dated 6/1/09 and attachments from Brisard review | 115 | 2917-3031 | 10 |
| Summer Rife laptop hard drive | 0 | N/A | 10 |

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DISCOVERY SPREADSHEET-11

| INVENTORY ITEM | NUMBER OF PAGES IN DOCUMENT | BATES NUMBERS | BATCH NUMBER |
|--|--------------------------------|---------------|-----------------|
| Letter dated 11/23/09 & CD to Federal Public Defender with electronic items listed on exhibit list | 3 | 3032-3034 | 11 |
| FBI report on criminal history inquiries for S/A Anderson, S/A Smith, R/A Greg Wooten, and Program Manager Christianson. | 1 | 3035 | 11 |
| IRS-CID report on criminal history inquireies for Thomas Wilcox, Evan Kohlmann, Daveed Gartenstein-Ross, Rajhi Kanan, Helen Moore, Debra Ingram, and Pirouz Sedaghaty. | 1 | 3036 | 11 |
| Expert Report: United States v. Al-Haramain Islamic Foundation, Pirouz Sedaghaty, and Soliman Hamad al-Buthe by Evan Kohlmann, International Terrorism Consultant. | 29 | 3037-3065 | 11 |
| DVD from Evan Kohlmann regarding video footage of activities at the Kavkaz Institute. | 1 | 3066 | 11 |
| Interview of Thomas Wilcox dated 8/14/09 with e-mail and attachment dated January 7, 2002. | 55 | 3067-3121 | 11 |
| Notes and interviews with notes of Greg Wooten, Thomas Wilcox, Daveed Gartenstein-Ross, Helen Moore, Debra Ingram, and Rajhi Kanan. | 110 | 3122-3231 | 11 |

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DATE OF RECEIPT

DISCOVERY SPREADSHEET-12

| <u>INVENTORY ITEM</u> | <u>NUMBER OF PAGES IN DOCUMENT</u> | <u>BATES NUMBERS</u> | <u>BATCH NUMBER</u> |
|---|--|----------------------|-------------------------|
| Grand Jury Testimony of Colleen Anderson dated February 17, 2005 | 137 | 3232-3368 | 12 |

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DATE OF RECEIPT

DISCOVERY SPREADSHEET-13

| <u>INVENTORY ITEM</u> | <u>NUMBER OF PAGES IN DOCUMENT</u> | <u>BATES NUMBERS</u> | <u>BATCH NUMBER</u> |
|--|--|----------------------|-------------------------|
| Letter from David Atkinson dated 4/7/2010 | 1 | 3369 | 13 |
| MOI dated 10/8/04 & 10/14/04 for Greg Wooten, Tax Exempt Specialist | 2 | 3370-3371 | 13 |
| Grand Jury Presentation | 82 | 3372-3453 | 13 |
| Internal Revenue Service TEGE correspondence and paperwork for Al Haramain Islamic Foundation | 94 | 3454-3547 | 13 |

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DATE OF RECEIPT

DISCOVERY SPREADSHEET-14

| <u>INVENTORY ITEM</u> | <u>NUMBER OF PAGES IN DOCUMENT</u> | <u>BATES NUMBERS</u> | <u>BATCH NUMBER</u> |
|---|--|----------------------|-------------------------|
| Notes from interview with Daveed Gartenstein-Ross dated 2/23/04 | 6 | 3548-3553 | 14 |
| 302 dated 4/22/10 for Daveed Gartenstein-Ross | 3 | 3554-3556 | 14 |
| 302 dated 9/28/04 for Barbara Cabral | 6 | 3557-3562 | 14 |
| FD-1023 dated 4/23/08 for Barbara Cabral | 1 | 3563 | 14 |
| FD-1023 dated 2/26/10 for Barbara Cabral | 2 | 3564-3565 | 14 |
| FD-1023 dated 3/2/10 for Barbara Cabral | 2 | 3566-3567 | 14 |
| FD-1023 dated 3/8/10 for Barbara Cabral | 4 | 3568-3571 | 14 |
| FD-1023 dated 4/26/10 for Barbara Cabral | 2 | 3572-3573 | 14 |
| MOI dated 12/3 & 12/6/2004 with Richard and Barbara Cabral | 4 | 3574-3577 | 14 |
| Translations from segments of DVDs of Kavkaz Institute | 3 | 3578-3580 | 14 |
| Bank of America records to include wire transfers and signature card. | 37 | 3581-3618 | 14 |
| Photos from search warrant | 84 | 3619-3703 | 14 |
| Picture of AHIF Ashland building | 1 | 3704 | 14 |
| AHIF Ashland building floor plan | 11 | 3705-3715 | 14 |

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DISCOVERY SPREADSHEET-15

| <u>INVENTORY ITEM</u> | <u>NUMBER OF PAGES IN DOCUMENT</u> | <u>BATES NUMBERS</u> | <u>BATCH NUMBER</u> |
|---|--|----------------------|-------------------------|
| First batch of bank records from Al Rajhi Bank | 19 | 3716-3734 | 15 |
| Translation of al Rajhi bank records | 24 | 3735-3758 | 15 |
| Translation of date on AHIF-2 & 3 | 2 | 3759-3760 | 15 |
| E-mail regarding chechnya fund | 1 | 3761 | 15 |
| Curriculum vitae for Jeremy Christianson | 5 | 3762-3766 | 15 |
| E-mail reply by AU to Sheeshaan e-mail | 4 | 3767-3770 | 15 |
| Interview of David Berger, Attorney at Law dated 5/13/2010 | 3 | 3771-3773 | 15 |

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 DATE OF RECEIPT

DISCOVERY SPREADSHEET-16

| <u>INVENTORY ITEM</u> | <u>NUMBER OF PAGES IN DOCUMENT</u> | <u>BATES NUMBERS</u> | <u>BATCH NUMBER</u> |
|---|--|----------------------|-------------------------|
| Memorandum of Contact with Lawrence Matasar dated December 8, 2003. | 2 | 3774-3775 | 16 |
| Second batch of bank records from Al-Rajhi Bank | 7 | 3776-3782 | 16 |
| Translation of second batch of bank records from Al-Rajhi Bank | 11 | 3783-3793 | 16 |
| Exhibit JC-4 | 7 | 3794-3800 | 16 |
| David Hafer 302 dated 6/30/10 | 5 | 3801-3805 | 16 |

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 DATE OF RECEIPT

DISCOVERY SPREADSHEET-17

| <u>INVENTORY ITEM</u> | <u>NUMBER OF PAGES IN DOCUMENT</u> | <u>BATES NUMBERS</u> | <u>BATCH NUMBER</u> |
|---|--|----------------------|-------------------------|
| Grand Jury Testimony for Colleen Anderson dated 2/17/05 | 7 | 3806-3812 | 17 |

| | |
|------------------|------------------------|
| <u>SIGNATURE</u> | <u>DATE OF RECEIPT</u> |
|------------------|------------------------|

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Project

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| Folder Covers/Tabs | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Redweld Covers/Tabs | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Folder Descriptions | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Covers/Spines | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Divider Tabs | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Post-It Notes | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Mylar Flags | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Exception Sheets | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Burst Forms | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Standard Language | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> - SEE ATTACHED |

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Today's Date: AUG 13TH

Deadline Date: TUES Time: NOON
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Originals Received In: 24 BOXES
Deadline Approved By: KS

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☐ Doc Break ☐ OCR ☐ Code (Attach Coding Ticket)

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☐ Add Image Viewer (Circle One) **IV1** **IV2** **IV5**

☐ Load File Format: ☐ Std ☐ Custom (Complete Form 2)

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DEFENSES' EXHIBITS

| EXHIBIT NUMBER | DESCRIPTION | NOT ADMITTED / RECEIVED | ADMITTED / RECEIVED | STIPULATION | NOTES-COMMENTS |
|-------------------|--|----------------------------|------------------------|-------------|-----------------------------|
| 601 | Constitution of Al Haramain Islamic Foundation (Saudi Arabia) | | X | | Rob Brown or Rogers |
| 602 | Monthly report and statement of purpose (PF) | | X | | Florin |
| 602 A | Monthly Report and Statement of Purpose Declaration of Cooperation Statement between Qu'ran Foundation and Al Haramain Foundation March 6, 1998 | | X | | Rob Brown may have prepared |
| 602 B | Signed Statement of Purpose Declaration of Cooperation Statement between Qu'ran Foundation and Al Haramain Foundation | | X | | Rob Brown may have prepared |
| 602 C | Statement of Purpose and Declaration of Cooperation between Qu'ran Foundation and Al Haramain Islamic Foundation with printed signatures Solimon Al Buthe, Abu Unus, Dawood Rodgers, and Robert L. Brown | | X | | Rob Brown may have prepared |
| 606 | Email January 1, 2000, 2:37 p.m. P to Al Buthe | | X | | |
| 607 | Photograph Pete Seda and Solomon Al Buthe under tree | | X | | |
| 608 | Photograph Pete Seda, Rob Brown, John Dunn and David Rodgers | | X | | |
| 609 | Photograph including Rob Brown, David Rodgers and Pete Seda | | X | | |
| 610 | Photograph of 3800 South Highway 99 with camel | | X | | |
| 611 | Photograph of cultural tent at 3800 South Highway 99 | | X | | |
| 612 | Photograph Al Haramain building | | X | | |
| 613 | Photograph of David Rodgers with King Abdullah | | X | | |
| 614 | Email June 26, 2000 AQ to b@qf.org on his trip- and extremism | | X | | |

| EXHIBIT NUMBER | DESCRIPTION | NOT ADMITTED / RECEIVED | ADMITTED / RECEIVED | STIPULATION | NOTES-COMMENTS |
|-------------------|--|----------------------------|------------------------|-------------|----------------|
| 614 A | Attachment to June 26 2000 email June 25, 2000 Albuthe to AQ | | X | | |
| 634 | CNN.com webpage December 18, 1999, "Russian Bombardment Intensifies As Troops Close On Grozny" | | X | | |
| 637 | CNN web page February 16, 2000, "NATO, Russia Relax Tense Relations" | | X | | |
| 641 | CNN.com February 21, 2000 Russia Chechnya webpage | | X | | |
| 668 | Bank of America check and traveler's check purchase | | X | | |
| 669 | Email January 11, 2000, 14:38:08 S-El Fiki to Haramain | | X | | |
| 670 | Email January 18, 2000, Haramain to S. El Fiki | | X | | |
| 671 | Email February 21, 2000, 9:12 a.m. head office to S. El Fiki | | X | | |
| 672 | February 21, 2000, Letter Aqeel to El Fiki | | X | | |
| 673 | February 14, 2000, Fax S. El Fiki to Nasir Eid National Bank of Kuwait | | X | | |
| 673 A | English translation of February 14, 2000, Fax S. El Fiki to Nasir Eid National Bank of Kuwait | | X | | |
| 673 B | Declaration of Translation of February 14, 2000, Fax S. El Fiki to Nasir Eid National Bank of Kuwait | | X | | |
| 674 | Email February 24, 2000 P to Al Buthe RE money transferred | | X | | |
| 680 A | Email Abdul Qadir to Haramain May 11, 1999 Report of Committee on Albania | | X | | |
| 681 | Email December 11, 1999, Abdul Qadir to Qur'an and Sunnah Net Group; Jeddah-Net@muslimsonline.com | | X | | |
| 682 | Email December 28, 1999, 4:26 p.m. from Info to Info@irw.org | | X | | |

| EXHIBIT NUMBER | DESCRIPTION | NOT ADMITTED / RECEIVED | ADMITTED / RECEIVED | STIPULATION | NOTES-COMMENTS |
|-------------------|---|----------------------------|------------------------|-------------|----------------|
| 683 | Email December 30, 1999, 8:50 p.m. P to Al Buthe | | X | | |
| 683 A | Attachment to email Statement in Spanish and English from Ayuda Internacional Al Desplazado | | X | | |
| 683 B | Email from Al buthe to P December 31, 1999 Human Help for Chechnya | | X | | |
| 683 C | Email January 1, 2000 P to Albuthe RE Horrible Condition | | X | | |
| 683 D | Email from Al Buthe to P, January 2, 2000 at 4:58 AM | | X | | |
| 685 | Email from Abdul-Qaadir to q@qf.org, January 4, 2000 at 1:00 AM | | X | | |
| 685 A | Email attachment January 4, 2000 at 1:00 AM | | X | | |
| 686 | Email January 6, 2000, 1:35 a.m. Al Buthe to P | | X | | |
| 686 A | Email January 6, 2000, 1:37 a.m. Al Buthe to P | | X | | |
| 686 B | Email January 7, 2000, 3:48 p.m. Info to Info@irw.org | | X | | |
| 686 C | Email January 12, 2000, 5:43 p.m. Info to Info@irw.org | | X | | |
| 687 | Email Daveed Gartenstein-Ross to P January 17, 2000 | | X | | |
| 687 A | Email P to Daveed Gartenstin-Ross January 17, 2000 | | X | | |
| 687 B | Email Chain P to B February 21, 2000, including Daveed Gartenstein-Ross to P 1/17/2000 RE Horrible Condition and P to Al Buthe 1/1/2000 RE Horrible Condition | | X | | |
| 687 C | Email P to Daveed Gartenstein-Ross January 18, 2000 plus attachment | | X | | |
| 687 D | Email P to Daveed Gartenstein-Ross January 18, 2000 | | X | | |

| EXHIBIT NUMBER | DESCRIPTION | NOT ADMITTED / RECEIVED | ADMITTED / RECEIVED | STIPULATION | NOTES-COMMENTS |
|-------------------|--|----------------------------|------------------------|-------------|----------------|
| 688 A | Email January 22, 2000, 11:23 p.m. Ashland to Al Buthe | | X | | |
| 689 | Letter January 24, 2000, Pete Seda to Responsible Secretariat of Federation Committee for International Technical Humanitarian Cooperation | | X | | |
| 689 A | Email January 27, 2000, 10:08 a.m. Info to Info@irw.org | | X | | |
| 690 | Email AQ to Sheeshan February 3, 2000 | | X | | |
| 691 | Email P to Daveed Gartenstein-Ross February 4, 2000 | | X | | |
| 691 A | Email P to Daveed Gartenstein-Ross February 8, 2000 | | X | | |
| 692 | Email Q to AQ February 12, 2000 | | X | | |
| 692 A | Email from Q to Sunnah, February 12, 2000, with path to Time.com, Photo Essay RE: Grozny | | X | | |
| 692 B | Photographs Time.com photo essay, Russian Soldiers Rest in Downtown Grozny | | X | | |
| 692 C | Blinded and Bound, Chechen Civilians | | X | | |
| 692 D | Chechen Men in Pit | | X | | |
| 692 E | Chechen Boy in Cellar | | X | | |
| 692 F | Chechen Woman with Son | | X | | |
| 692 G | Fallen City | | X | | |
| 693 | Email P to Al Buthe February 15, 2000 | | X | | |
| 693 A | Email The Arborist to Al Buthe February 17, 2000 | | X | | |
| 693 B | Email P to B February 19, 2000 | | X | | |
| 693 C | Email P to Al Haramain February 20, 2000 | | X | | |
| 694 | Email February 20, 2000 The Arborist to B@qf.org | | X | | |

| EXHIBIT NUMBER | DESCRIPTION | NOT ADMITTED / RECEIVED | ADMITTED / RECEIVED | STIPULATION | NOTES-COMMENTS |
|-------------------|--|----------------------------|------------------------|-------------|----------------|
| 694 A | Email P to MCA February 21, 2000 | | X | | |
| 694 B | Email February 21, 2000, 11:34 p.m. from the Arborist to B@qf.org | | X | | |
| 694 C | Email February 21, 2000, 10:54 a.m. The Arborist to B@qf.org | | X | | |
| 694 D | Email February 21, 2000, 5:48 p.m. The Arborist to B | | X | | |
| 695 | Email Chain P to B February 21, 2000 including P to Daveed Gartenstein-Ross /19/2000and Daveed Gartenstein-Ross to P 2/8/2000 RE: Chechnya | | X | | |
| 696 | Email AQ to Sheeshaan February 23, 2000 | | X | | |
| 697 | Email February 29, 2000, 12:16 p.m. P to B@qf.org | | X | | |
| 697 A | Email Q to PJ Florin February 29, 2000 | | X | | |
| 697 B | Email P to B March 1, 2000 | | X | | |
| 698 A | Email Q to Granel March 1, 2000 with Memo to Bilal | | X | | |
| 698 C | Email March 1, 2000, 10:55 a.m. Q to P@qf.org | | X | | |
| 698 D | Email March 1, 2000, 11:29 a.m. P to PJFlorin@jeffnet.org | | X | | |
| 698 H | Email Q to The Arborist March 3, 2000 | | X | | |
| 699 | Email P to Al Buthe March 3, 2000 | | X | | |
| 699 A | Email March 4, 2000 p to q@qf.org | | X | | |
| 699 B | Attachment to Email March 4, 2000 | | X | | |
| 700 A-G | Email March 5, 2000 P to b@qf.org FW: I need your help! | | X | | |
| 731 | Al Haramain Website list of Al Haramain bank accounts | | X | | |
| 748 | Handwritten document captioned "Wire Transfer" top line \$2767 | | X | | |

| EXHIBIT NUMBER | DESCRIPTION | NOT ADMITTED / RECEIVED | ADMITTED / RECEIVED | STIPULATION | NOTES-COMMENTS |
|-------------------|--|----------------------------|------------------------|-------------|----------------|
| 749 A | Email December 30, 1999 8:20 a.m. Tom to Pete Seda | | X | | |
| 749 B | Proposal attachment to email: Letter Tom Wilcox to Pete Seda December 30, 1999 | | X | | |
| 750 | Engagement letter from Tom Wilcox to Pete Seda | | X | | |
| 751 | Handwritten list, top line 2/24/2000 Mahmoud T. El Fiki | | X | | |
| 752 | Check #9733 June 23, 2000 | | X | | |
| 753 | Check #9733 6/23/2000 | | X | | |
| 754.42318 | 2000 Form 990 | | X | | |
| 754.42335 | 2000 Stte CT-12 Return | | X | | |
| 754.42477 | 2001 Form 990 | | X | | |
| 754.42494 | 2001 State CT-12 Return | | X | | |
| 754.42532 | Letter from Internal Revenue Service to Al Haramain dated September 2, 2002 | | X | | |
| 754.42533 | Letter from Internal Revenue Service to Al Haramain dated February 20, 2002 | | X | | |
| 754.42540 | Letter from OR DOJ to Al Haramain dated October 30, 2001 | | X | | |
| 754.42659 | Letter from OR DOJ to Al Haramain dated June 19, 2001 | | X | | |
| 754.42703 | Letter from OR Dept of Revenue to Al Haramain dated August 8, 2000 | | X | | |
| 754.42810 | Letter from Internal Revenue Service to Al Haramain dated May 31, 2002 | | X | | |
| 754.42895 | Letter from OR DOJ to Al Haramain dated February 22, 2001 | | X | | |
| 754.42896 | 1999 Form 990 | | X | | |
| 754.43005 | 1998 Corporate Return Form 1120 | | X | | |

| EXHIBIT NUMBER | DESCRIPTION | NOT ADMITTED / RECEIVED | ADMITTED / RECEIVED | STIPULATION | NOTES-COMMENTS |
|-------------------|---|----------------------------|------------------------|-------------|----------------|
| 754.43014 | Oregon Corporation excise tax return 1998 | | X | | |
| 754.43075 | Letter from Internal Revenue Service to Al Haramain dated December 7, 2000 | | X | | |
| 754.43104 | Letter from Internal Revenue Service to Al Haramain dated October 13, 2000 | | X | | |
| 754.43111 | Letter form Tom Wilcox to OR DOJ dated September 22, 2000 | | X | | |
| 754.43112 | Letter form OR DOJ to Al Haramain dated September 7, 2000 | | X | | |
| 754.43127 | Letter from Tom Wilcox to Internal Revenue Service dated September 25, 2000 | | X | | |
| 754.43129 | Letter form Internal Revenue Service to Al Haramain dated September 6, 2000 | | X | | |
| 754.43156 | Letter from Tom Wilcox to Internal Revenue Service dated August 17, 2000 | | X | | |
| 754.43158 | Letter from Internal Revenue Service to Al Haramain dated March 24, 2000 | | X | | |
| 754.43193 | 1023 Application | | X | | |
| 754.43238 | Letter from Internal Revenue Service to Al Haramain dated March 16, 2000 | | X | | |
| 754.43252 | Letter from OR DOJ to Al Haramain dated July 26, 2000 | | X | | |
| 754.43257 | Letter from OR DOJ to Al Haramain dated April 11, 2000 | | X | | |
| 754.43337 | Letter from Internal Revenue Service to Al Haramain dated December 22, 2003 | | X | | |
| 754.43340 | Letter from OR DOJ to Al Haramain dated November 21, 2003 | | X | | |
| 754.43341 | Letter from OR DOJ to Al Haramain dated October 16, 2003 | | X | | |
| 754.43356 | Letter from OR DOJ to Al Haramain dated June 4, 2003 | | X | | |

| EXHIBIT NUMBER | DESCRIPTION | NOT ADMITTED / RECEIVED | ADMITTED / RECEIVED | STIPULATION | NOTES-COMMENTS |
|-------------------|--|----------------------------|------------------------|-------------|----------------|
| 754.43360 | Letter from OR DOJ to Al Haramain dated April 4, 2001 | | X | | |
| 754.43411 | Letter from OR DOJ to Al Haramain dated October 30, 2000 | | X | | |
| 754.43433 | Letter from Tom Wilcox to Internal Revenue Service dated January 3, 2002 | | X | | |
| 754.43434 | Letter from Internal Revenue Service to Al Haramain dated December 31, 2001 | | X | | |
| 754.43437 | Letter from Tom Wilcox to Internal Revenue Service dated October 2, 2001 | | X | | |
| 754.43438 | Letter form Internal Revenue Service to Al Haramain dated September 24, 2001 | | X | | |
| 754.43447 | Letter from OR DOJ to Al Haramain dated August 24, 2001 | | X | | |
| 754.43459 | 1999 State CT-12 Return | | X | | |
| 754.43462 | Letter from Tom Wilcox to OR DOJ dated January 8, 2001 | | X | | |
| 754.43487 | Letter from Internal Revenue Service to Al Haramain dated February 4, 2000 | | X | | |
| 754.43512 | Letter from Internal Revenue Service to Al Haramain dated June 1, 2000 | | X | | |
| 754.43660 | Letter from Internal Revenue Service to Al Haramain dated April 18, 2001 | | X | | |
| 755.1 | Email from P to Tom Wilcox, May 14, 2001 | | X | | |
| 755.2 | Attachment to 755.1 - QuickBooks File | | X | | |
| 755.3 | Floppy Disk from Tom Wilcox, Labeled "Al Haramain 6/14/2001 ." | | X | | |
| 755.4 | QuickBooks file located on 755.3 | | X | | |
| 755.5 | Email January 7, 2002 form Tom Wilcox to P | | X | | |
| 755.6 | Attachment to 755.5 - QuickBooks File | | X | | |

| EXHIBIT NUMBER | DESCRIPTION | NOT ADMITTED / RECEIVED | ADMITTED / RECEIVED | STIPULATION | NOTES-COMMENTS |
|-------------------|---|----------------------------|------------------------|-------------|----------------|
| 755.7 | Quickbooks | | X | | |
| 755.8 | Cone Quickbooks | | X | | |
| 755.9 | Email March 13, 2001 from Tom Wilcox to Pete Sedda | | X | | |
| 755.1 | Attachment to 755.9-QuickBooks File | | X | | |
| 755.11 | Email June 12, 2001 from P to Shoumar, Abdulaziz S | | X | | |
| 755.12 | Attachment to 755.11-QuickBooks File | | X | | |
| 755.13 | September 19-24 Wilcox data entry report | | X | | |
| 756 | Email January 2, 2000, 1:13 p.m. P to Ms. Katkhouda | | X | | |
| 759 | Email February 26, 2000, 12:45 a.m. from Al Buthe to P@qf.org | | X | | |
| 760 | Email March 6, 2000 Al Shoumar to q@qf.org | | X | | |
| 760 A | Attachment to Email March 6, 2000 Al Shoumar to q@qf.org | | X | | |
| 761 | Email from Q to P March 7, 2000, Six months budget with attachment | | X | | |
| 762 | Email from P to Shoumar January 3, 2001 RE springfield@alharamain.org | | X | | |
| 802 | Letter Proposal April 11, 2000, Pete Seda | | X | | |
| 803 A | Email April 12, 2000, 11:57 a.m. PJFlorin@jeffnet.org to Pete Seda 3 | | X | | |
| 803 B | Draft greetings letter.doc attached to email | | X | | |
| 803 C | Draft public relations letter re Islam attached to email | | X | | |
| 803 D | Draft Greeting Letter (PF) | | X | | |
| 803 E | Draft greeting letter (short version) PF | | X | | |
| 803 F | Letter April 11, 2000 Public relation plan (PF) | | X | | |

| EXHIBIT NUMBER | DESCRIPTION | NOT ADMITTED / RECEIVED | ADMITTED / RECEIVED | STIPULATION | NOTES-COMMENTS |
|-------------------|--|----------------------------|------------------------|-------------|----------------|
| 805 B | Attachment to email, Letter April 19, 2000, Pete Seda to Aqeel al Aqeel | | X | | |
| 806 | Letter April 19, 2000, Pete Seda to Aqeel al Aqeel | | X | | |
| 813 | Letter to State Department 9/18/2001 (PF) | | X | | |
| 910 | Email October 9, 2000 P to Al Buthe RE; Tajikistan | | X | | |
| 911 | Email October 23, 2001 P to Al Buthe RE make it work out -- with attachments | | X | | |
| 925 | Photo Pete Seda with truck | | X | | |
| 966 | MAIL TRIBUNE article: Class Tries To Bridge The Ignorance Gap | | X | | photo only |
| 967 | Photograph class at tent | | X | | |
| 1002 | Pete Seda Video Statistics | | X | | |
| 1004 | Letter and Check \$300 November 15, 1999 | | X | | |
| 1005 | Check \$50 November 20, 1999 | | X | | |
| 1006 | Check \$100.00 November 20, 1999 | | X | | |
| 1007 | Check \$100.00 December 1, 1999 | | X | | |
| 1008 | Money order \$300 December 6, 1999 | | X | | |
| 1009 | Check \$400.00 December 20, 1999 | | X | | |
| 1010 | Check \$200.00 January 1, 2000 | | X | | |
| 1011 | Check and Envelope \$600.00 January 5, 2000 | | X | | |
| 1012 | Check \$150.00 January 19, 2000 | | X | | |
| 1013 | Check \$68.00 January 22, 2000 | | X | | |
| 1014 | Checks \$50,000.00, \$4,000, \$196.75 January 21, 2000 | | X | | |
| 1015 | Check and Deposit ticket February 23, 2000 | | X | | |
| 1016 | check | | X | | |

| EXHIBIT NUMBER | DESCRIPTION | NOT ADMITTED / RECEIVED | ADMITTED / RECEIVED | STIPULATION | NOTES-COMMENTS |
|-------------------|--|----------------------------|------------------------|-------------|----------------|
| 1030 | Chase batch ticket | | x | | |
| 1031 | Chechnya donations | | x | | |
| 1034 | Photograph of interior of trailer searched | | x | | |
| 1047 | Photograph of interior of trailer searched, specifically depicting a box of "Pete's ...tapes." | | x | | |
| 1064 | Demonstrative Exhibit of QuickBooks Activity | | x | | |
| 1065 | Springfield Building Schedule per Jeff Cone | | x | | |
| 1201 A | Urgent Appeal Kosova, April 2, 1999, faxed to Al Haramain on April 2, 1999 | | x | | |
| 1201 B | Time Sheet of Mr. Gartenstein-Ross for April 1999 | | x | | |
| 1201 E | "Give Five Minutes For Kosova," Kosova Task Force, USA, Justice for All | | x | | |
| 1201 F | Check written to Kosova Task Force, USA, dated April 2, 1999 | | x | | |
| 1210 | Email Exchange between Mr. Gartenstein-Ross and Soliman Al Buthe, May 4th and 5th, 1999 | | x | | |
| 1216 | Email exchange between Mr. Gartenstein-Ross and Soliman Al Buthe, March 5, 2000 | | x | | |
| 1238 | Excerpt of Wilcox Working Papers Presented During Testimony | | x | | |
| 1238 A | Check \$21,000 #9624 | | x | | |
| 1238 B | Check \$131,300 #9456 | | x | | |

| EXHIBIT NUMBER | DESCRIPTION | NOT ADMITTED / RECEIVED | ADMITTED / RECEIVED | STIPULATION | NOTES-COMMENTS |
|-------------------|--------------------------|----------------------------|------------------------|-------------|----------------|
| 1238 C | Check \$10,000 #9002 | | x | | |
| 1238 D | Check \$318,291.74 #9733 | | x | | |
| 1238 E | Reconciliation Report | | x | | |

DISCOVERY SPREADSHEET-18

| <u>INVENTORY ITEM</u> | <u>NUMBER OF PAGES IN DOCUMENT</u> | <u>BATES NUMBERS</u> | <u>BATCH NUMBER</u> |
|---|--|----------------------|-------------------------|
| <u>Interview notes and reports concerning Barbara Cabral (redacted)</u> | | | |
| Notes dated 09-28-04 | 3 | 3813-3815 | 18 |
| Notes dated 12-03-04 & 12-06-04 | 3 | 3816-3818 | 18 |
| Notes dated 04-14-08 (no report) | 2 | 3819-3820 | 18 |
| Notes dated 04-15-08 | 2 | 3821-3822 | 18 |
| Notes dated 02-26-10 | 1 | 3823 | 18 |
| Notes dated 03-2-10 | 1 | 3824 | 18 |
| Notes dated 03-8-10 | 7 | 3825-3831 | 18 |
| Notes dated 04-26-10 | 6 | 3832-3837 | 18 |
| Notes dated 10-5-04 (no report) | 1 | 3838 | 18 |
| Report & notes dated 1-2-08 | 2 | 3839-3840 | 18 |
| <u>Barbara Cabral comments within interviews and notes with Richard Cabral (redacted)</u> | | | |
| Report & notes dated 2-7-08 | 4 | 3841-3844 | 18 |
| Report & notes dated 3-21-05 | 4 | 3845-3848 | 18 |
| Report & notes dated 8-17-07 | 6 | 3849-3854 | 18 |
| Report & notes dated 9-12-03 | 5 | 3855-3859 | 18 |
| <u>Richard Cabral interviews and notes (redacted)</u> | | | |
| Report & notes dated 02-06-06 | 6 | 3860-3865 | 18 |
| Report & notes dated 09-27-04 | 7 | 3866-3872 | 18 |

INVENTORY ITEM

NUMBER OF PAGES
IN DOCUMENT

BATES NUMBERS

BATCH
NUMBER

SIGNATURE

DATE OF RECEIPT